

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Experimental Presorted
Priority Mail Rate Categories

Docket No. MC2000-11
POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

**NEWSPAPER ASSOCIATION OF AMERICA
INTERROGATORIES TO
UNITED STATES POSTAL SERVICE WITNESS
THOMAS M. SCHERER (NAA/USPS-T1-1-8)
April 30, 2001**

The Newspaper Association of America ("NAA"), hereby submits the attached interrogatories to United States Postal Service witness Thomas M. Scherer (NAA/USPS-T1-1-8) and respectfully requests a timely and full response under oath.

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

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April 30, 2001

Certificate of Service

I hereby certify that I have this 30th day of April, 2001, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker
William B. Baker

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NAA/USPS-T1-1: For the most recent 12 month period for which data are available, please provide:

- a. the proportion of Priority Mail mailings that have consisted of at least 300 pieces or at least 500 pounds;
- b. the proportion of Priority Mail mailings that have consisted of at least 150 pieces or at least 250 pounds.

NAA/USPS-T1-2: For the most recent 12 month period for which data are available, please provide:

- a. the approximate number of Priority mailers that entered mailings of at least 300 pieces or at least 500 pounds;
- b. the approximate number of Priority mailers that entered mailings of at least 150 pieces or at least 250 pounds.

NAA/USPS-T1-3: Please refer to your response to Presiding Officer's Information Request No. 1, Question 3.

- a. Who within the Postal Service would have the responsibility of establishing the minimum piece and/or pound requirements?
- b. Would you be involved in establishing the minimum piece and/or pound requirements?
- c. What minimum piece and/or pound requirements do you believe would be appropriate for the discounts that you propose? Please explain why.

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NAA/USPS-T1-4: Would a Priority Mailing of 300 one-pound pieces, of which 150 sets of two pieces each were presorted to 150 different 5-digit ZIP Codes, be eligible for the proposed discount (assuming that the mailer were accepted as a participant in the experiment)?

NAA/USPS-T1-5: Please confirm that it is your understanding that the cost estimates provided by witness Levine upon which you base your recommended discounts do not require a minimum volume of pieces at any particular level of presort. If you cannot confirm, please explain why not.

NAA/USPS-T1-6: Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 200 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between the two mailings of which you are aware.

NAA/USPS-T1-7: Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 100 pieces presorted to the same 5-digit ZIP Code. Please identify any presort-related cost differences between the two mailings of which you are aware.

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NAA/USPS-T1-8: Assume two Priority mailings, one consisting of 300 pieces presorted to a 5-digit ZIP Code, and the second consisting of 200 pieces presorted evenly (100 pieces each) between two 5-digit ZIP Codes. Please identify any presort-related cost differences between the two mailings of which you are aware.